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AO 91 (Rev. 11/11) Criminal Complaint

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Task Force Officer: Branden Jousma, DEATelephone: (313) 226-9100  
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**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Brandon Jermaine MILES

Case: **2:19-mj-30529**  
Assigned To : **Unassigned**  
Assign. Date : **10/4/2019**  
**USA V MILES (CMP)(CMC)**

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 3, 2019 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. §§ 841(a)(1), 846

Conspiracy to Distribute Controlled Substances including Fentanyl, Heroin, and Cocaine.

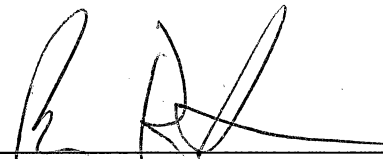
18 U.S.C. §§ 922(g), 924(c)

Felon in Possession of a Firearm and Possession of a Firearm in Furtherance of a Drug Trafficking Crime.

This criminal complaint is based on these facts:

See Attached Affidavit.

☐ Continued on the attached sheet.

  
Complainant's signature

Branden R. Jousma, Task Force Officer, DEA  
Printed name and title

Sworn to before me and signed in my presence.

Date: October 4, 2019

City and state: Detroit, MI

  
Judge's signature

Honorable R. Steven Whalen, U.S. Magistrate Judge  
Printed name and title

### **AFFIDAVIT IN SUPPORT OF COMPLAINT**

Affiant, Task Force Officer Branden Jousma, being duly sworn, deposes and states the following:

1. I am a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), and have been since January 7, 2015. I am an investigative or law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is authorized by law to conduct investigations of and to make arrests for offenses enumerated in Title 21, United States Code, Section 801, et seq., and Title 18, United States Code, Section 2516. I am currently assigned to the DEA Detroit Field Division Office, Detroit, Michigan. I have received specialized training while attending the DEA Training Academy in Quantico, Virginia, concerning illegal drug and money laundering offenses. During my assignment with DEA, I have participated in complex drug trafficking investigations. During the course of these investigations, I have participated in surveillance, examination of financial records, and controlled buys. Furthermore, I have been a sworn police officer in the State of Michigan for the past 20 years. I have experience as an

Undercover Narcotic Detective with the Michigan State Police  
Western Wayne Narcotic Task Force.

2. In addition to the above-mentioned training and experience, I have had the opportunity to speak with and observe several other federal and state officers who have extensive experience in drug and money laundering investigations and with interpreting the coded language that individuals involved in these illicit activities commonly use, as well as knowledge of the patterns and behavior of individuals involved in drug trafficking organizations (DTOs) and money laundering organizations (MLOs), in the Eastern District of Michigan and elsewhere. I have also conferred with investigators who have extensive experience in writing and preparing Title III Affidavits and participating in Title III investigations. I have personally participated in the investigation of the offenses set forth below and, as a result of my participation and review of past and present reports made by other DEA Special Agents, as well as other state and local law enforcement agencies, I am fully familiar with the facts and circumstances of this investigation.

3. This affidavit is provided in support of a criminal complaint against Brandon Jermaine MILES and is based on my personal knowledge obtained from personal observation, review of documents, reports, and information received from other law enforcement agents and subject-matter experts. Because of the limited purpose of this affidavit, I have not set forth all of the information of which I have become aware in the course of this investigation.
4. On October 3, 2019, DEA Special Agent (SA) Brian Sams obtained federal search warrants authorized by Eastern District of Michigan United States Magistrate Judge R. Steven Whalen. The authorized search warrant was for the residences associated with Brandon MILES at 14421 Bramell Street and 15801 LaSalle Boulevard, both in Detroit, Michigan.
5. On October 3, 2019, at approximately 6:00 p.m., agents/officers from Task Force Group 2 (TFG2) and DEA Special Response Team (SRT), executed a federal search warrant 14421 Bramell, Detroit, Michigan. During the execution of the search warrant, agents/officer observed and ordered Brandon MILES from the basement, and placed him in handcuffs. Also present in the

residence was the minor child, Brooklyn Ladia Miles, the daughter of Brandon MILES.

6. At approximately 6:17 p.m., SA Sams, witnessed by TFO Jousma, read Brandon MILES his Miranda rights. TFO Jousma searched MILES' person, seizing an undetermined amount of United States Currency (USC) and two (2) cellular phones from his front pants' pockets. MILES was transported to the Dearborn Police Department to be interviewed.
7. At approximately 6:25 p.m., agents/officers from TFG2 and Michigan State Police K-9 handler Ben Sonstrom, conducted a thorough search of the residence.
8. In the southwest master bedroom, TFO Jousma, witnessed by TFO Michael Lencioni, located a blue backpack type bag on the floor near a dresser. A search of the bag revealed an undetermined amount of USC, a black wallet containing Michigan Identification for Brandon MILES and two (2) plastic baggies with tied knots. TFO Jousma seized the USC and photographed the Michigan Identification and plastic baggies. In the closet, TFO Jousma located a red Biltmore box that contained a men's fashion hat, with a stack of undetermined amount of USC. TFO Jousma located a gun case

that contained an unloaded Beretta handgun (Serial Number BER0174537) in the second drawer of the dresser. Additionally, the same drawer contained a Glock magazine with ammunition.

9. In the upstairs hallway closet, TFO Jousma, witnessed by TFO Chad McDonald, located and seized a sheet of paper with phone numbers and names handwritten.

10. In the kitchen, TFO Jousma, witnessed by TFO McDonald, located and seized two cell phones from the kitchen counter.

11. In the basement common area, TFO Jousma, witnessed by TFO Lencioni, located and seized two (2) sifters, a blender top, empty zip lock gallon size bags, all with suspected drug residue. A white Styrofoam cup containing a white chunky power – suspected cocaine – and a small plastic bag containing a white with purple tinted powder – suspected heroin/fentanyl – was seized. All items listed above were located on a small card table that contained drug residue all over it, believed to be used as a drug cutting table. The suspected cutting table and suspected heroin/fentanyl and cocaine were within easy access to MILES's nine (9) year old daughter, who lives with him at the location.

12. During a thorough search of the furnace room in the basement, TFO Jousma, witnessed by TFO Lencioni, located and seized an unloaded AR-15 rifle (Serial number F257140), and two unloaded (2) shotguns (serial numbers 0205778 and A905077), approximately 15 feet from the suspected cutting table.

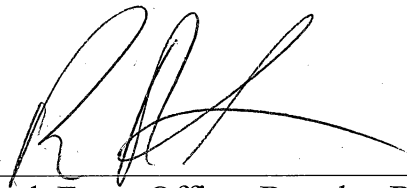
13. MILES has at least seven (7) prior felony convictions in the Third and Thirty-first Circuit Courts in the state of Michigan. His first felony conviction was in 1996 and his last in 2017.

14. At approximately 6:50 p.m., agents/officers from TFG2 and DEA SRT executed a federal search warrant at 15801 LaSalle. During a thorough search of a tan Lincoln Town Car, SA Sams, witnessed by, SA Stacy Zirkle, located and seized a plastic baggie containing a white with purple tinted powder, suspected to be heroin/fentanyl, along with an undetermined amount of USC in the glove box.

15. On October 4, 2019, SA Mark Gogan weighed both plastic baggies containing suspected heroin/fentanyl seized from both locations. The baggie seized from 14421 Burmell was approximately 12.6 grams. The baggie seized from 15801 LaSalle was approximately 19.6 grams, with a total weight of approximately 32.4 grams.

Additionally, SA Gogan conducted a preliminary field test with a TruNarc, with the results being positive for acetyl-fentanyl.

16. Based on the foregoing, as well as his training and experience, your affiant is of the opinion that there is probable cause to support the issuance of a criminal complaint against Brandon Jermaine MILES for the crime of Conspiracy to Distribute Controlled Substances including Fentanyl, Heroin and Cocaine, in violation of 21 U.S.C. §§ 841(a)(1) and 846; Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g); and, Possession of a Firearm in Furtherance of a Drug Trafficking Crime, in violation of 18 U.S.C. § 924(c).



Task Force Officer Branden R. Jousma  
Drug Enforcement Administration

Sworn to before me and signed in my presence  
this 4<sup>th</sup> day of October, 2019.



HONORABLE R. STEVEN WHALEN  
United States District Court  
Eastern District of Michigan